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August 22 2024

VIA ECF

The Honorable Sidney H. Stein  
United States District Judge  
United States District Court for the  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

Re: United States v. Nadine Menendez, (S4) 23-cr-490 (SHS)/UNDER SEAL

Dear Judge Stein:

We represent Defendant Nadine Menendez. I write to Your Honor in advance of our telephonic hearing this morning.

As the government correctly indicated in its prior letter to the Court, on August 16, 2024, the parties are in substantial agreement concerning the setting of a proposed trial date in this case. From my point of view, the area of disagreement to be presented to the Court today relates only to the question of the extent to which the parties' recent submissions concerning Ms. Menendez should be redacted.

The government's position is that this instant letter from me should be made part of the public record, in addition to much of its letter to the Court of August 16, 2024. While we respectfully disagree with this position, given the government's view I am reluctant to state here our perspective concerning redactions and its rationale, and instead will reserve that for the hearing in a few hours. Instead, I attach, for the Court's consideration, the parties' two competing proposed redacted versions of the government's letter of August 16, 2024. The government's version is first, followed by my proposal.

I am grateful for the opportunity to address this issue in our telephonic status hearing this morning.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Barry Coburn". The signature is fluid and cursive, with the first name "Barry" being more prominent than the last name "Coburn".

Barry Coburn